

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY,**

**Plaintiff,**

**v.**

**BEAR PRODUCTIONS, INC.,**

**Defendant.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**Case No. 12-CV-469 RAW**

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiff, St. Paul Fire and Marine Insurance Company, and Defendant, Bear Productions, Inc., move for, and stipulate to, the dismissal of this action, and all claims made in it, with prejudice to future filing, with each party to bear their respective costs, expenses and attorney fees.

Respectfully submitted,

**ANDREWS KURTH LLP**

**JAMES, POTTS & WULFERS, INC.**

/s/ Courtney E. Ervin

J. Wiley George, Texas Bar #07805445  
Courtney E. Ervin, Texas Bar #24050571  
600 Travis, Suite 4200  
Houston, Texas 77002  
(713) 220-4123  
(713) 238-7475 – Fax  
[wileygeorge@andrewskurth.com](mailto:wileygeorge@andrewskurth.com)  
[courtneyervin@andrewskurth.com](mailto:courtneyervin@andrewskurth.com)

**ATTORNEY FOR PLAINTIFFS ST.  
PAUL FIRE AND MARINE  
INSURANCE COMPANY**

*(signed by attorney for Defendant Bear with  
permission of attorney for Plaintiff)*

/s/ Shannon Davis

David W. Wulfers, OBA #9926  
Todd Maxwell Henshaw, OBA #4114  
Shannon Davis, OBA #17572  
2600 Mid-Continent Tower  
401 South Boston Avenue  
Tulsa, Oklahoma 74103-4015  
(918) 584-0881  
(918) 584-4521 – Fax  
[dwulf@jpwlaw.com](mailto:dwulf@jpwlaw.com)  
[thenshaw@jpwlaw.com](mailto:thenshaw@jpwlaw.com)  
[sdavis@jpwlaw.com](mailto:sdavis@jpwlaw.com)

**ATTORNEYS FOR DEFENDANT  
BEAR PRODUCTIONS, INC.**